

October 26, 1994



Environmental Protection Agency, Region 9
Office of Pacific Island and Native American Programs (E-4)
75 Hawthorne Street
San Francisco, CA 94105

Attn: Ms. Pat Young, Program Manager

Dear Pat:

Attached is an annual update on the Pollution Prevention Program for VCS Samoa Packing Company per the NPDES Permit No. AS 0000027, Section L., Item 5.

If you have any questions, please feel free to contact me at phone no. 619-597-4212.

Sincerely,

James L. Cox

Director of Engineering and Environmental Affairs

JLC:ms cc: Dan Sullivan Attachment 102694.2JC

VCS SAMOA PACKING COMPANY POLLUTION PREVENTION PROGRAM ANNUAL UPDATE 10-26-94

A. FACILITIES SYSTEMS AND REVIEW

- 1. Cover trench drains in fishroom (completed 4-25-93). Ongoing.
- Install back-up viscera pump in fishroom (completed 4-25-93).
 Ongoing.
- 3. Increase viscera pump discharge line from 2" to 4" (completed 6-25-93). Ongoing.
- Construct larger infeed and discharge hopper for viscera grinder (completed 4-25-94).
 In addition, modifications to the existing grinder was made in Jan.'94 to eliminate viscera backing up and falling into trenches.
- 5. Install new screens in the meal plant press (completed 6-22-93). Ongoing.
- 6. Replace bearings in meal plant decanter (completed 2-22-94). Ongoing.
- 7. Educate and enforce "dry cleanup". Ongoing.

Now Williams

- 8. Devise and institute a Water Conservation Plan. A capital purchase has been approved for flowmeters. Estimated date a new improved plan can be in effect is 3-15-95.
- 9. Redirect packing room handwash discharge (completed 5-10-94). Ongoing.
- 10. Capital modifications to wastewater plant including installation of large flocculation tank and larger DAF unit. This was completed in June 1994.
- 11. Install screen in fish room sump (completed 5-16-94). Ongoing.

- 12. Install new flow recorder/totalizer in wastewater effluent and use automatic sampler (completed 7-20-93). Ongoing.
- 13. Install water flush system on DAF float trough (completed 5-20-93). New DAF does not require this at the present time.
- 14. Level wier in DAF (completed 4-17-93).New DAF wier was leveled during installation.
- 15. Wastewater Operator Training. Ongoing.
- 16. Polymer Feed Strengths. Ongoing.
- 17. DAF Removal Efficiencies

EFFECTIVENESS OF DAF NITROGEN CONCENTRATIONS

<u>1993</u>	% Removal <u>EFF.</u>	EFF. <u>Mg/L</u>	INF. <u>Mg/L</u>	<u>TONS</u>
JAN FEB MAR APR MAY JUN JULY AUG SEPT OCT NOV	58 34 52 49 41 51 46 41 44 50 45	125 135 130 137 151 139 148 137 133 125	299 206 271 270 256 282 274 233 239 252 237	6,928 4,243 5,695 6,795 6,690 8,245 8,251 7,847 7,285 7,540 6,549
DEC	60	111	277	5,460
<u>1994</u>			·	
JAN FEB MAR APR MAY	59 48 57 45 49	109 131 140 146 130	264 251 244 266 253	7,167 5,497 7,778 7,015 4,194

B. WASTEWATER CONSERVATION PROGRAM

- 1. Metering of major departments and goal setting. Approval of capital funds to purchase meters was obtained. Target date: March 1995.
- 2. Fit all washdown hoses with automatic shut-off nozzles. Purchase of shut-off nozzles is ongoing.
- Practice "dry cleanup".
 Ongoing.
- 4. Maintain plant water pressure at 75 psig. Ongoing.
- 5. Reduce size of washdown hoses from 3/4" to 1/2" diameter. Ongoing.
- 6. Recycle retort cooling water. Ongoing.
- 7. Reuse water usage in boiler.
 No progress.
- Increased use of detergents, sanitizers, and high pressure water reduces water usage.
 We are in the process of adding an additional high pressure pump to the fishroom area.

C. FISHING VESSEL INFORMATION AND REUSE OIL PROGRAM

1. We are continuing to remind vessel agents of their responsibility of keeping oily wastes from entering the harbor from fishing vessels.

2. We are continuing to burn waste oil, delivered by ASG or generated at Sampac, in the Sampac steam boilers.

D. REPORT ON METALS IN EFFLUENT

The following results were obtained in lab samples of the VCS Samoa Packing effluent.

· How?

· Frequency?

· In what

form?

· Inspections?

· MOA with

fishing

Company (s)?

	FEB 93 <u>MG/L</u>	OCT 93 <u>MG/L</u>	FEB 94 <u>MG/L</u>
Arsenic	9.8	ND	25
Copper	21	ND	13
Lead	4.3	ND	ND
Selenium	ND	ND	22
Zinc	380	400	660

The amounts of zinc occurring is due to background water, excessive corrosion and flaking of zinc coatings (i.e. retort baskets) naturally occurring metals in fish waste, and small quantities of some corrosion inhibitors used in cooling towers. The exposure time at the mixing zone can be measured in seconds at a depth of approximately 180 ft. The existing toxicity mixing zone for ammonia (80:1) if allowed to apply to the above metals would meet Water Quality Standards.

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